

Flow rates and vacuum levels in each recovery well will be recorded during the monthly system inspections. This data will be used to evaluate fouling and/or clogging of the recovery wells. To prevent fouling and clogging, the wells will be acid washed monthly or as needed for the first six months of operation. After six months, the acid washing schedule will be adjusted accordingly based on data collected during the first 6 months of operation.

NJDEP: The effectiveness monitoring program is acceptable. The effectiveness monitoring will occur monthly. The effectiveness monitoring will involve operation of the plume perimeter delineation wells to monitor volume of product present within each well, calculation of the the volume of product recovered from each recovery well, calculation of the total volume of product recovered, the determination of the water level within each well, and the determination of the vacuum and flow rates of each well.

Ground water quality sampling will not occur during product recovery.

Post-Remediation Monitoring

Revlon: After product recovery ceases, the treatment system will be shut down and the ground water conditions will be allowed to equilibrate.

The system will then be operated monthly for a period of one year to determine if free product is still present in any of the wells. Monthly inspection of down gradient monitoring wells for free product will also continue. If free product is not found in any of the recovery wells or monitoring wells during the one year period, a request for No Further Action regarding the free product plume will be submitted to the NJDEP.

After confirming the absence of free product in the wells for one year, ground water samples will be collected from the recovery wells and analyzed for VO and BNs. The sample results will be to evaluate the presence of dissolved contaminants in ground water. If dissolved contaminants are identified in the former plume area, a Classification Exception Area proposal will be submitted to the NJDEP.

NJDEP: The proposed post-remedial monitoring program is conditionally acceptable. The conditions are as follows:

-The duration of the post-remedial product monitoring shall be as per the requirements of the Technical Requirements for Site Remediation, N.J.A.C. 7:26E-6.3(e). As per N.J.A.C. 7:26E-6.3(e), the duration of the post-remedial monitoring shall occur for a minimum of two years. Petitions for a variance from the requirements can be submitted. The petition shall be as per the requirements of the Technical Requirements For Site Remediation, N.J.A.C. 7:26E-1.6(e). It is recommend that after one year of product monitoring, the monitoring results accompanied by a proposal be submitted to the NJDEP for review.

-The downgradient monitoring wells shall be identified.

